

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

COUNTER TERRORIST GROUP US,  
COUNTERR GROUP, and J. K. IDEMA,

Plaintiffs,

- against -

AUSTRALIAN BROADCASTING CORP.;  
a/k/a ABC AUSTRALIA; ABC  
CORPORATIONS 1-100; LIZ JACKSON;  
ERIC CAMPBELL; JOSEPH A CAFASSO;  
EDWARD A. ARTIS; KNIGHTSBRIDGE  
INTERNATIONAL, INC.; KNIGHTSBRIDGE  
INTERNATIONAL HUMANITARIAN  
RELIEF AND HUMAN IMPROVEMENT  
PROGRAMS, INC.; ROBERT C. MORRIS;  
PARTNERS INTERNATIONAL  
FOUNDATION; WILLIAM JOHN HAGLER,  
Both Individually and Severally, and DOES 1  
through 7, inclusive,

Defendants.

08 Civ 2356 (DAB)

**NOTICE OF MOTION TO  
DISMISS FOR LACK OF SUBJECT  
MATTER JURISDICTION OR  
ON GROUNDS OF *FORUM NON  
CONVENIENS***

PLEASE TAKE NOTICE that, upon the annexed declaration of Robert Simpson, Esq., dated May 21, 2008; the declaration of Eric Campbell, dated May 20, 2008; the declaration of Liz Jackson, dated May 20, 2008; the expert declaration of John Sheahan, dated May 21, 2008; the affidavit of Edward J. Davis, Esq., dated May 20, 2008, and the exhibits annexed thereto, the accompanying memorandum of law; and all other pleadings and proceedings, defendants the Australian Broadcasting Corporation and Liz Jackson will move before this Court, Hon. Deborah A. Batts, United States District Judge, Southern District of New York, in Courtroom 24B of the United States Courthouse, 500 Pearl Street, New York, New York on the 5<sup>th</sup> day of August, 2008 or such other time and place as the Court may direct, for an order dismissing the complaint herein without prejudice for lack of subject matter jurisdiction pursuant to Fed. R. Civ. P. 12(b)(1) or, in the alternative, on the grounds of *forum non conveniens*.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to an agreement between the parties, Plaintiffs' papers in opposition to Defendants' motion shall be due on July 21, 2008, and Defendants' reply papers in further support of its motion shall be due on August 4, 2008.

Dated: New York, New York  
May 21, 2008

DAVIS WRIGHT TREMAINE LLP

By:   
Marcia B. Paul (MP 8427)  
Edward J. Davis (ED 1266)  
Monica Pa (MP 3307)

1633 Broadway – 27th Floor  
New York, New York 10019  
Telephone: (212) 489-8230  
Fax: (212) 489-8340

*Attorneys for Defendants  
Australian Broadcasting Corp. and Liz Jackson*

TO:

J. K. Idema, *Plaintiff Pro Se*  
12 Jonathan Lane  
Poughkeepsie, NY 12603

John Edwards Tiffany, Esq.  
Law Offices of John E. Tiffany P.C.  
The Robert Treat Center  
50 Park Place, 10<sup>th</sup> Floor  
Newark, NJ 07102

*Counsel for Plaintiff Counter Terrorist Group US*